

Mr. Phillip L. Isenberg (Chair)
MLPA Initiative Blue Ribbon Task Force
c/o California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

March 1, 2006

Comments sent via email to MLPAComments@resources.ca.gov

Dear Chairman Isenberg and Members of the MLPA Blue Ribbon Task Force:

Thank you for the opportunity to submit comments on the Draft Monitoring, Evaluation and Adaptive Management Framework and the Initial Draft Management Plan Framework. We commend the work that has clearly been put into these documents. As you are aware, Oceana has been compiling and analyzing information on the California Coast for several years to identify Important Ecological Areas. These are areas that stand out based on their habitats, biological significance, and contribution to the incredible resources of the California Current Large Marine Ecosystem. As we have highlighted in previous letters to you, many of these areas have been left out of the current stakeholder negotiations that are being used by the Blue Ribbon Task Force as a basis for Marine Protected Area designation. While some of these areas may not receive additional management protection as the result of the current MLPA process, these areas should be acknowledged and recognized as Ecologically Important Areas. In the event that some of these Ecologically Important Areas do not become MPAs in the current process, we must not sacrifice the opportunity to protect these areas when we revisit California's MPA network in the future.

We recommend:

1. Ecologically Important Areas of the Central California Coast be acknowledged and recognized, regardless of whether they are designated MPAs in the current process.
2. Research and monitoring efforts be focused on these areas for consideration as new or modified MPAs in an adaptive management process.

The first goal of the Marine Life Protection Act is "To protect the natural diversity and abundance of marine life, and the structure, function, and integrity of marine ecosystems." Section 2853(b)(1). While we recognize the tremendous efforts thus far on behalf of stakeholders, scientists, and MLPA staff, we also recognize that accomplishing this and other MLPA goals will require a great deal of learning and understanding of the California Current Large Marine Ecosystem, beyond what we have today. In fact, Section 2853(c)(3) of the MLPA requires "provisions for monitoring, research, and evaluation at selected sites to facilitate adaptive management of MPAs and ensure that the system meets the goals stated in this

Mr. Phillip L. Isenberg

March 1, 2006

Page 2

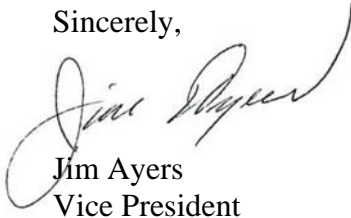
chapter.” Therefore, we expect that the first round of MPAs that result from the current MLPA initiative will be improved upon in future efforts.

Section 4B in the Draft ME&AMF document discusses indicators and measurements of progress. Here, given that research and monitoring resources are limited, it is important to select indicators of human-caused impacts to the ecological features along the California Coast. In our October 15, 2005 proposal and subsequent correspondence, we identified key ecological features within each of the 51 Ecologically Important Areas of the Central California Coast. The ME&AMF should therefore identify indicators for ecological features for monitoring Ecologically Important Areas, regardless of their MPA designation status. Specifically, these features should include forage fish abundance, sensitive habitat quality, and abundance of top predators (including birds and mammals).

Any framework for adaptive management, research, and monitoring must recognize Ecologically Important Areas along the California Coast regardless of currently proposed management measures. In the name of political compromise, we must not sacrifice the opportunity to closely monitor these sites for possible protection in the future.

Thank you for your commitment to meeting the goals of the MLPA and laying a foundation today so that future generations can continue to enjoy California’s incredible ocean resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Ayers", with a stylized flourish extending from the end.

Jim Ayers
Vice President